

Chapter 6

Program Requirements and Regulations

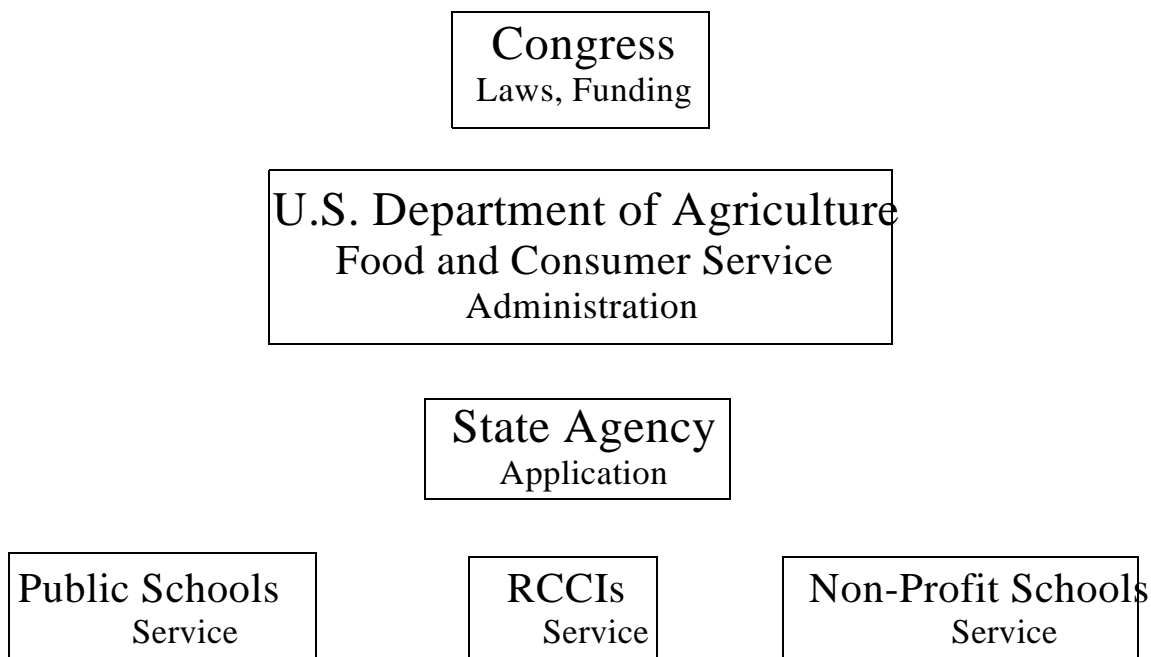


In this unit RCCI personnel will learn the structure, operation, and history of Child Nutrition Programs; things to do to comply with regulations and when to do them; how to organize and maintain records, and the vocabulary unique to Child Nutrition Programs.

Child Nutrition Programs have many requirements and regulations designed to safeguard children's needs and protect taxpayers' interests. If the regulations that apply to RCCIs are taken in simple segments, it turns out they are not so overwhelming. This unit will present an overview of the program, the pertinent rules in plain language, and, on page 6-3, a simple timetable of things to do. The organization chart below shows how Child Nutrition Programs are organized.

Here, in a nutshell, is how it works: Congress passed two laws—the National School Lunch Act and the Child Nutrition Act—that authorize school lunch and school breakfast. Congress appropriates money and designates the U.S. Department of Agriculture to administer the program. At the state level it is usually administered within the state, usually by the state education agency.

On the next page is a list of things that must be done to fulfill the contract.



History

Child Nutrition
Programs evolved during more than 100 years of developing and evaluating school lunch for children. As early as 1913, 30 cities in 14 states offered lunch in their schools. Research and testing to provide the best nutrition, nutrition education, and food service for the nation's millions of children has gone on ever since.

With the depression of the 1930s, federal assistance was made available to help both agriculture and school lunch programs. Needy families and school lunch programs became outlets for the surplus commodities that the U.S. Department of Agriculture (USDA) bought to shore up the faltering farm economy.

World War II ended farm surpluses, but the nation developed a new appreciation for the importance of healthy young people called to protect the nation. The National School Lunch Act (NSLA) of 1946 established school lunch programs throughout the nation and brought the federal government into permanent partnership with states and local schools. The NSLA established program

standards that included requirements that the program be non-profit, that certain Nutrient Standards be met, that meals be available to low-income children, that state and local school officials control the program and be accountable to the federal government through the state.

The Child Nutrition Act of 1966 broadened the school meal concept to include school breakfast. Subsequent amendments changed the meal pattern to include "Offer versus Serve" for older children and increased reimbursement to pay the full cost of free and reduced-price meals. A 1989 amendment set the breakfast pattern to include milk, fruit or vegetable or full strength juice, two servings of bread or meat or their alternates or one serving of each. This amendment also allowed students to refuse one item at breakfast. A 1990 amendment required that students be offered low-fat milk, as well as whole milk.

The School Meals Initiative (SMI) Regulations, which took effect in July 1996, represented the first major changes in meal requirements in the fifty years of the history of

school lunch.

Records Maintenance

On page 6-4 is a suggested system for organizing records. This system shown is not mandatory but makes sure that all the records that are required in the regulations are readily available. The system may be adapted to meet the needs of each individual RCCI.

A plastic filing box with hanging folders is a handy way to keep all the records together wherever you want to use them. Such filing boxes are available in all office supply stores, usually for under \$10. Or keep records in a filing cabinet. Title folders as listed and put them in alphabetical order.

Keep records for current year and three previous years. When closing out the current fiscal year, discard the oldest previous year, unless you are in an audit process. Example: when closing out 1999 and starting 2000, discard the records from 1996 but save 1997, 1998, and 1999. Store records by fiscal year - July 1 through June 30. Records must be readily accessible. If a program is being audited or investigated, the RCCI must retain records for the period in question until the audit or investigation is closed.

Things to Do and When

Priority	Things to Do	When
1.	Complete individual determination form for each child if required by State Agency. Use current income eligibility guidelines. Personal use income is the income applicable for institutionalized children.	When child is first admitted and update each July 1
2.	Update master roster. (Complete list of currently approved children.)	Continually as new children are admitted
3.	Determine which menu planning option to use.	At completion of training
4.	Plan, prepare, and serve reimbursable meals meeting USDA Nutrient Standards at breakfast and lunch.	At each meal
5.	Complete food production records recording actual amount of food served.	At each meal
6.	Count, by category, and record the meals that qualify for reimbursement.	At time of each meal service
7.	Complete claim for breakfast and lunch reimbursement. Do edit checks and submit claim.	By the 10 th of each month following service
8.	Pay, by check, for food, supplies, salaries, and services.	Monthly or as purchased
9.	Keep file of all invoices and receipts.	As received per month
10.	Balance checkbook to bank statement.	Monthly
11.	Complete and submit contract update forms, licenses, and meal count procedures.	As required by the state
12.	Record price comparisons for buying food (see form in purchasing unit).	Every 6 months
13.	Conduct inventory of food and supplies on hand.	June 30
14.	Develop a written procurement form and record price comparisons for buying food.	Once or twice a year
15.	Attend mandatory training sessions.	As required by the state
16.	Record training sessions for employees.	List as an agenda item at staff meetings
17.	Retain all records for three years, plus the current year, unless an audit is in progress. Discard older record per your agency's policy.	On-going
18.	Display AND JUSTICE FOR ALL poster.	On-going

19.	Provide special diets prescribed by medical authority. (Consult with State Agency.)	On-going
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RCCI Filing System for Child Nutrition Program Records

Civil right records (ethnic distribution of children and employees, if any)

Contract Agreement update with state agency

Edit check forms, if not included on meal count roster (in chronological order)

Enrollment forms (separate current residents from those no longer in residence)

Financial records (folder for each category)

Bank statements and canceled checks

Claims for reimbursement (in chronological order)

Inventories of purchased food and non-food item values

Receipts and invoices for food and supplies

Receipts of program income

Supermarket price comparisons (as needed)

Time sheets and earning statements of employees

Food Production Records (in chronological order)

Income eligibility guidelines (current, effective July 1 each year)

Individual determination forms (or proof and date of placement)

License to operate appropriate agency

Master roster (current resident roster in front)

Meal counts (taken at point-of-service daily and totaled daily and monthly)

Menus (substitutions noted)

Menu Analysis if NuMenus or Assisted NuMenus - Nutrition Analysis for processed food products

Pest control treatment record (not required, but handy to have)

Sanitation inspections (issued by Health Department)

Records of training sessions for employees